

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>No.: 4:13-CR-00077 HEA-DDN</b>
	)	
<b>v.</b>	)	
	)	
<b>JACOB OLSON,</b>	)	
	)	
<b>Defendant,</b>	)	

**MOTION FOR RELEASE PENDING SENTENCING**

COMES NOW Defendant, by counsel, Mark R. Bahn, and for his Motion for Release Pending Sentencing pursuant to 18 USC (a)(2)(B), states to the Court as follows:

1) That Defendant Jacob Olson is presently scheduled to enter a plea of guilty on Wednesday, July 31, 2013, at 11:00 a.m. to two counts of criminal charges in the above matter pursuant to the Plea Agreement executed between Defendant and the U.S. Attorney's Office; and

2) That it is anticipated that the sentencing range for the offenses to which the Defendant will be pleading guilty is twelve to eighteen (12 – 18) months pursuant to the Federal Sentencing Guidelines; and

3) Defendant is presently employed by Convergys Corporation; is living with his father and has strong family ties to the St. Louis community; and

4) Further, Defendant is presently on probation with the Circuit Court of the City of St. Louis on charges ancillary to the ones being prosecuted herein. A violation of his conditions of probation which would include fleeing a sentencing court date or posing a danger to any other person or community WILL subject the Defendant to at least five

(5) years and as many as fifteen (15) years in the Missouri Department of Corrections as promised by the Honorable Robin Vannoy, Circuit Judge, Division 5, Circuit Court of the City of St. Louis.

5) Defendant was on electronic monitoring for almost two years while his state charges were pending through EMass probation and never missed any court dates; never had any violations and was always current on his payments; and

6) Counsel for Defendant submits that Defendant Jacob Olson has in the past shown by clear and convincing evidence that he is not likely to flee nor pose a danger to any other person or the community.

WHEREFORE, for the foregoing reasons and for good cause shown, Defendant, by counsel, moves this Court for Release of the Defendant pending sentencing pursuant to 18 USC § 3143, and for such further and other relief as this Court may deem meet and just.

*Respectfully submitted,*

McAVOY AND BAHN, L.C.

BY: /s/ Mark R. Bahn  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing *Motion for Release Pending Sentencing* was served this 29<sup>th</sup> day of July, 2013, electronically filing with the clerk of the court by using CM/ECF system, which sent notification of such filing to the following parties:

RICHARD G. CALLAHN

United States Attorney

TRACY L. BERRY

Assistant United States Attorney

111 s. Tenth Street, Room 20.333

St. Louis, MO 63102

/s/ Mark R. Bahn

*Attorney for Defendant*